

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

APFA, INC.

Plaintiff,

VS.

Case No. 3:20-cv-05007

UATP MANAGEMENT, LLC,

Defendant.

**[PROPOSED] ORDER FOR INJUNCTIVE RELIEF
PURSUANT TO *FED. R. CIV. P. 65***

THIS MATTER having been opened to the Court on Motion by the Plaintiff, APFA, Inc., by and through its counsel, for an Order Preliminarily Enjoining Defendant UATP Management, Inc. pursuant to *Fed. R. Civ. P.* 65, and upon the papers submitted by counsel, and for good cause being shown,

IT IS on this day of , 202,

ORDERED that, pending a determination by this Court on the merits, the Defendant is enjoined from enforcing, or attempting to enforce, the arbitration agreement contained within the so-called “Amendment to Franchise Agreement (Membership Agreement)” as against any franchisee; and

IT IS FURTHER ORDERED that this preliminary injunction is granted on a nationwide basis.

Hon. Michael A. Shipp, U.S. Maj. Judge